

**REMARKS**

Applicant gratefully acknowledges the Examiner's time by telephone on December 11, 2006 to discuss the rejections of the claims. Claims 1-7 and 13-20 are pending. Claims 8-12 and 21-37 have been withdrawn from consideration.

**Rejections Under 35 U.S.C. § 103**

The Examiner asserted that claims 1-3, 6-7, 13-14, and 19-20 are unpatentable over AAPA in view of U.S. 6,641,874 (Kuntz et al.; "Kuntz") and further in view of U.S. 6,911,238 (Okawa et al.; "Okawa") under 35 U.S.C. § 103. Applicants respectfully disagree.

The present application relates to a transmission type liquid crystal display (LCD). A problem to be solved in the present application is inadequate transmission of light through the optical film to the liquid crystal panel. As one approach to solving this problem, the present application describes and the claims require a linear polarizer directly coated on a phase difference film.

The Examiner still has provided no motivation to combine the multilayer reflective film of Kuntz with the optical film of AAPA to arrive at this limitation of the claims. Applicants point out that "a prior art reference must be considered in its entirety, i.e., as a whole, including portions that would lead away from the claimed invention." *W.L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d. 1540, 220 USPQ 303 (Fed. Cir. 1983), cert. denied, 469 U.S. 851 (1984). As recited in the abstract, in col. 1, lines 6-12 and elsewhere in the reference, Kuntz relates to multilayer reflective films and pigments for cosmetic, decorative, or security applications. The present application is directed toward optical films that transmit light to a liquid crystal panel, as recited by the independent claims. Kuntz teaches that "particularly striking viewing angle dependent color effects can be achieved by providing a multilayer pigment, film or coating according to the present invention..." (col. 1, lines 55-57). (Emphasis added.) As pointed out in Applicants' prior responses, such viewing angle dependent color effects (also known as "color shift") are undesirable in the art of liquid crystal displays (LCDs).

Indeed, other references cited by the Examiner teach methods to compensate for or prevent viewing angle dependent color effects in LCDs, such as, for example, U.S. Patent 6,879,356 (Hsieh et al.; "Hsieh"). Hsieh teaches an optical device employing an E-mode polarizer "to enhance brightness and viewing angle property and prevent color shift." (e.g., col. 2, lines 21-55, and col. 4, lines 30-46) (Emphasis added.) Since Kuntz teaches multilayer reflective films having an enhanced color effect (col. 1, line 60), one of ordinary skill in the art of liquid crystal displays would have no motivation to combine the reflective film of Kuntz with the optical film of AAAP to obtain the linear polarizer contacting the phase difference film as recited in the present claims.

The Examiner also asserted that "as a general available knowledge, such directly coating and contacting would reduce the thickness of the device, so as to reduce the light absorption and increasing the brightness..." The Examiner further asserted that Okawa provides evidence of this in col. 23, lines 16-42. In fact, the section of Okawa to which the Examiner refers recites "when the polarization selective film of the present invention is used in a liquid crystal display device, the light utilization efficiency is increased with the result that the brightness of the display is increased." There is no mention of a second film, let alone directly coating a linear polarizer on a phase difference film to increase the brightness of the display. Nor does Okawa provide a motivation to combine the optical film of AAAP with the multilayer reflective film of Kuntz described above to obtain the optical film as recited in the present claims.

For at least the preceding reasons, the Examiner has not established a *prima facie* case of obviousness. Applicants respectfully request that the rejections of claims 1-3, 6-7, 13-14, and 19-20 under 35 U.S.C. § 103 be withdrawn.

The Examiner asserted that claims 4-5 and 16-17 are unpatentable over AAPA and Kuntz as applied to claims 1-3, 6-7, 13-14, and 19-20, and further in view of U.S. 6,882,386 B2 (Moon et al.) under 35 U.S.C. § 103.

The Examiner also asserted that claim 15 is unpatentable over AAPA and Kuntz as applied to claims 1-3, 6-7, 13-14, and 19-20 above, and further in view of U.S. 5,110,623 (Yuasa et al.).

The Examiner also asserted that claim 18 is unpatentable over AAPA and Kuntz as applied to claims 1-3, 6-7, 13-14, and 19-20 above, and further in view of U.S. 6,879,356 (Hsieh et al.).

Applicants respectfully disagree, at least in view of the remarks made above. Per the preceding arguments, the Examiner has not established a *prima facie* case of obviousness to support a 35 U.S.C § 103 rejection of claims 1, 2 and 13. Claims 4-5 are dependent on claim 2, and claims 15,16-17, and 18 are dependent on claim 13. Therefore, Applicants respectfully request that the rejections of claims 4-5 and 16-17, claim 15, and claim 18 under 35 U.S.C. § 103 be withdrawn.

## Summary

Applicants believe that the currently pending claims are in condition for allowance. The Examiner is invited to contact the undersigned attorney for the Applicants via telephone if such communication would expedite allowance of this application.

Respectfully submitted,



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